

## **REMARKS**

### **I. Introduction**

With the cancellation herein without prejudice of claim 18, claims 16, 17, and 19 to 28 are pending in the present application. In view of the foregoing amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

### **II. Information Disclosure Statement**

Regarding the Information Disclosure Statement, submitted herewith is a Supplemental Information Disclosure Statement citing copies of WO/2000/023376 which was indicated to have not been received and providing a copy of the English language abstract thereof.

### **III. Allowed Claim**

Applicants note with appreciation the indication that claim 19 is allowed.

### **IV. Objection to Claim 22**

Claim 22 was objected to based on alleged informalities.

In response, claim 22 has been amended herein without prejudice to place a space between "1" and "nm".

Withdrawal of this objection is respectfully requested.

### **V. Rejection of Claims 16 and 20 to 23 Under 35 U.S.C. § 102**

Claims 16 and 20 to 23 were rejected under 35 U.S.C. § 102(b). The Patent Office has contended that these claims are anticipated by U.S. Patent No. 5,233,181 ("Kwansnick et al."). It is respectfully submitted that Kwansnick et al. do not anticipate the present claims for at least the following reasons.

Claim 16 is directed to a layer system, including a second partial layer made of an organic compound. Claim 16 has been amended herein without prejudice to recite that the organic compound includes a silane corresponding to one of an organic fluorine silane, an organic fluorochlorine silane, and a siloxane.

Support for this amendment may be found, for example, in claim 18 as originally presented.

Kwansnick et al. generally disclose a photosensitive element having a two tier passivation layer disposed between a top contact layer and an amorphous silicon photosensor island. According to Kwansnick et al., the upper tier of the passivation layer is an organic dielectric layer, preferably a polyimide.

Kwansnick et al. do not disclose, or even suggest, all of the features of claim 16. Specifically, nowhere do Kwansnick et al. disclose - or is even alleged to disclose - that the organic compound includes a silane corresponding to one of an organic fluorine silane, an organic fluorochlorine silane, and a siloxane.

Accordingly, it is respectfully submitted that Kwansnick et al. do not anticipate claim 16. As for claims 20 to 23 which ultimately depend from claim 16, and therefore include all of the features recited in claim 16, it is respectfully submitted that Kwansnick et al. do not anticipate these dependent claims for at least the same reasons set forth above in support of the patentability of claim 16.

#### **VI. Rejection of Claims 16, 18, and 23 Under 35 U.S.C. § 103(a)**

Claims 16, 18, and 23 were rejected under 35 U.S.C. § 103(a). The Patent Office has contended that this claim is unpatentable over U.S. Patent Application Publication No. 2003/0013273 ("Hong et al."). It is respectfully submitted that Hong et al. does not render unpatentable these claims for at least the following reasons.

As indicated above, claim 16 has been amended herein without prejudice to incorporate the subject matter of canceled claim 18.

Hong et al. is directed to a device isolation structure comprising a trench formed in a predetermined area of a semiconductor substrate to define an active region; a lower isolation pattern having a top surface that is at a lower level than a top surface of the active region, the lower isolation pattern being formed in the trench; and an upper isolation pattern formed on the lower isolation pattern, wherein a sidewall and a bottom of the upper isolation pattern are surrounded by an upper liner pattern.

Hong et al. do not disclose, or even suggest, all of the features of claim 16. Specifically, nowhere do Hong et al. disclose that the organic compound includes a silane corresponding to one of an organic fluorine silane, an organic

fluorochlorine silane, and a siloxane. The Examiner refers to paragraph [0011] of Hong et al. as allegedly disclosing a second partial layer made of an organic compound. Even if this were true (which Applicants do not concede), paragraph [0011], as well as the rest of Hong et al., does not disclose that the organic compound includes a silane corresponding to one of an organic fluorine silane, an organic fluorochlorine silane, and a siloxane.

Accordingly, it is respectfully submitted that Hong et al. do not render unpatentable claim 16. As for claim 23 which ultimately depends from claim 16, and therefore includes all of the features recited in claim 16, it is respectfully submitted that Hong et al. do not render unpatentable this dependent claim for at least the same reasons set forth above in support of the patentability of claim 16.

#### **VII. Rejection of Claim 17 Under 35 U.S.C. § 103(a)**

Claim 17 was rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Kwansnick et al. and *Fluorinated polyimide fabrication by magnetically controlled reactive ion etching* ("Furuya et al."). It is respectfully submitted that the combination of Kwansnick et al. and Furuya et al. does not render unpatentable this claim for at least the following reasons.

Claim 17 depends from claim 16 and therefore includes all of the features included in claim 16. As explained above, Kwansnick et al. do not disclose, or even suggest, all of the features included in claim 16. Furuya et al. is not relied upon for disclosing or suggesting the features of claim 16 not disclosed or suggested by Kwansnick et al. Indeed, it is respectfully submitted that Furuya et al. do not disclose, or even suggest, the features included in claim 16 not disclosed or suggested by Kwansnick et al. As such, it is respectfully submitted that the combination of Kwansnick et al. and Furuya et al. does not render unpatentable claim 17, which depends from claim 16.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

**VIII. Rejection of Claims 25 and 26 Under 35 U.S.C. § 103(a)**

Claims 25 and 26 were rejected under 35 U.S.C. § 103(a) as unpatentable over Kwansnick et al. It is respectfully submitted that Kwansnick et al. does not render unpatentable these claims for at least the following reasons.

Claims 25 and 26 depend from claim 16 and therefore include all of the features included in claim 16. As explained above, Kwansnick et al. do not disclose, or even suggest, all of the features included in claim 16. As such, it is respectfully submitted that Kwansnick et al. does not render unpatentable claims 25 and 26, which depend from claim 16.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

**IX. Rejection of Claims 27 and 28 Under 35 U.S.C. § 103(a)**

Claims 27 and 28 were rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Kwansnick et al. and U.S. Patent Application Publication No. 2006/0108576 ("Laermer et al."). It is respectfully submitted that the combination of Kwansnick et al. and Laermer et al. does not render unpatentable these claims for at least the following reasons.

Claims 27 and 28 depend from claim 16 and therefore include all of the features included in claim 16. As explained above, Kwansnick et al. do not disclose, or even suggest, all of the features included in claim 16. Laermer et al. is not relied upon for disclosing or suggesting the features of claim 16 not disclosed or suggested by Kwansnick et al. Indeed, it is respectfully submitted that Laermer et al. do not disclose, or even suggest, the features included in claim 16 not disclosed or suggested by Kwansnick et al. As such, it is respectfully submitted that the combination of Kwansnick et al. and Laermer et al. does not render unpatentable claims 27 and 28, which depend from claim 16.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

**X. Rejection of Claims 16 and 24 Under 35 U.S.C. § 103(a)**

Claims 16 and 24 were rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of U.S. Patent No. 6,323,131 ("Obeng et al."), EP 0822586 ("Jeng"), and Hong et al. It is respectfully submitted that the combination of

Obeng et al., Jeng, and Hong et al. does not render unpatentable these claims for at least the following reasons.

As mentioned above, Hong et al. do not disclose, or even suggest, all of the features of claim 16. Specifically, nowhere do Hong et al. disclose that the organic compound includes a silane corresponding to one of an organic fluorine silane, an organic fluorochlorine silane, and a siloxane. Neither Obeng et al. nor Jeng cure this deficiency.

As such, it is respectfully submitted that the combination of Obeng et al., Jeng, and Hong et al. does not render unpatentable claim 16. As for claim 24 which depends from claim 16, and therefore includes all of the features recited in claim 16, it is respectfully submitted that the combination of Obeng et al., Jeng, and Hong et al. does not render unpatentable this dependent claim for at least the same reasons set forth above in support of the patentability of claim 16.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

## **XI. Conclusion**

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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